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ABDULLAH WAZWAZ, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABDULLAH WAZWAZ, JASON MOORE,
KENNETH YEUNG, AND BRIAN KAM, on
behalf of themselves and all similarly situated
individuals,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO,

Defendant.

TAIRI DE BERNARDI, STEPHEN VAL
KIRWIN, et al.

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO,

Defendant.

Case No. 18-cv-5580 HSG

**STIPULATION RE PROPOSED COLLECTIVE
ACTION NOTICE PROCEDURE AND
DEADLINES**

Assigned Judge: **Hon. Haywood S. Gilliam, Jr.**

Date Action Filed: September 12, 2018

Case No. 4:18-cv-04597-HSG

Date Action Filed: July 30, 2018

Cases Related: December 11, 2018

1 On September 12, 2018, Plaintiffs filed a civil complaint with this Court against Defendant.
2 Plaintiffs allege that they have not been properly compensated by Defendant in violation of the Fair
3 Labor Standards Act. On December 11, 2018, *De Bernardi v. City and County of San Francisco* Case
4 No. 18-cv-04597-HSG was related to this collective action and both matters were assigned to the
5 Honorable Haywood S. Gilliam Jr.

6 **IT IS STIPULATED BY THE PARTIES AS FOLLOWS:**

7 1) On February 7, 2019, the Court held a status conference and ordered the parties to meet and
8 confer and file a stipulation about a proposed collective action notice procedure in this action.
9 Pursuant to defense counsel's request, the Court set the deadline to file this stipulation for February
10 28, 2019.

11 2) The parties have started this meet and confer process, but have not had an opportunity to
12 finalize the proposed stipulation and notice. Due to other pending matters, defense counsel seeks a
13 one-week extension to complete this process and file a proposed stipulation and notice. Plaintiffs'
14 counsel has agreed to this one-week extension.

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1 3) Based on the above, the parties ask this Court to extend the filing deadline for the proposed
2 stipulation and notice from February 28, 2019 to March 7, 2019.

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4 Dated: February 28, 2019

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JONATHAN C. ROLNICK
Deputy City Attorneys

8 By: /s/ Boris Reznikov
9 BORIS REZNIKOV
Attorneys for Defendant

10 CITY AND COUNTY OF SAN FRANCISCO

11
12 Dated: February 28, 2019

MASTAGNI HOLSTEDT, APC

13
14 By: /s/ Ian B. Sangster
15 DAVID E. MASTAGNI, ESQ.
ISAAC S. STEVENS, ESQ.
IAN B. SANGSTER, ESQ.

16 Attorneys for Plaintiffs


17 ABDULLAH WAZWAZ, JASON MOORE, KENNETH
18 YEUNG, and, BRIAN KAM, on behalf of themselves
19 and all similarly situated individuals
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1 **[PROPOSED] ORDER**

2 It is hereby ordered that, pursuant to the parties' stipulation, the deadline to file the proposed
3 stipulation regarding the collective action notice procedure is extended from February 28, 2019 to
4 March 7, 2019.

5 IT IS SO ORDERED.

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7 Dated: 3/1/2019


8 HONORABLE HAYWOOD S. GILLIAM, JR.
9 United States District Judge
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